Data Submitted (UTC 11): 2/1/2024 7:57:10 PM
First name: Leslie
Last name: Kuhn
Organization:
Title:
Comments: Dear Forest Service Colleagues,

I'm writing to comment on the process of how outfitter permits in the Bob Marshall Wilderness and associated areas are evaluated and renewed. I'm familiar with the Wilderness and some of the outfitters who lead trips in the Wilderness from my backcountry travel in Montana, as a hiker and on horseback. What made my backcountry traversal unforgettable was the astounding untouched character of the areas we visited, and the amazing wildlife we saw. It is an outstanding wilderness worthy of the highest level of protection.

The people's and the Forest Service's major responsibility in the Bob Marshall Wilderness Complex is the preservation of this wilderness, which requires oversight rather than carelessness. Once damage to wilderness is done by human overuse and the encroachment of unnecessary and inappropriate infrastructure, the resulting erosion, encroachment of invasive species, human-instigated fire and unauthorized trails, and disruption of hydrology and wildlife habitat is seldom undone, due to the limited budgets available for enforcement and restoration. We need to assess current conditions in areas visited by outfitters in the Bob Marshall, and the compatibility of outfitter activities and the number of people they bring in, to prevent damage from occurring.

The Bob Marshall Wilderness Complex Outfitter and Guide Permit Reauthorization lacks specific information about the extent of activities that will be reauthorized for the very large number of outfitters (63!), and also has not been transparent in sharing public complaints about inappropriate activities in the Wilderness and how they are being resolved by the Forest Service. In particular, a published evaluation is needed of existing ecological conditions on trails and campsites, including high-sensitivity areas hosting uncommon plants and animals, and areas particularly prone to damage such as wetlands and stream crossings, to assess whether the proposed number of outfitters and visitors is compatible with or has damaged or otherwise negatively impacted (e.g., by sound or disturbance of wildlife corridors) the ecological integrity of this wilderness.

Furthermore, the following information should be made available for public review and comment:

- permitted service days versus actual use for each permit

- annual inspections, performance evaluations, or public complaints related to each campsite or operator

- any NEPA documents and related decisions dealing with outfitters in the Bob Marshall Wilderness Complex

- Campsite Management Plans for each outfitter camp

Given the many impacts outfitting has on the Wilderness, the Forest Service must not use a Categorical Exclusion (CE) to renew any outfitter permit. An Environmental Assessment with accompanying public input is needed to protect the Bob Marshall Wilderness Complex.